

Marc M. Seltzer (54534)
Steven G. Sklaver (237612)
Oleg Elkhunovich (269238)
Meng Xi (280099)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
mseltzer@susmangodfrey.com
ssklaver@susmangodfrey.com
oelkhunovich@susmangodfrey.com
mxi@susmangodfrey.com

P. Ryan Burningham (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
rburningham@susmangodfrey.com

James Q. Taylor-Copeland (284743)
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
james@taylorcopelandlaw.com
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Counsel for Lead Plaintiff Bradley Sostack

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

DISCOVERY MATTER

This Document Relates to:

All Actions

**DECLARATION OF P. RYAN
BURNINGHAM IN SUPPORT OF LEAD
PLAINTIFF'S REPLY IN SUPPORT OF
HIS MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
PRIVILEGE LOG**

DATE: March 25, 2021
TIME: 1:30 pm
PLACE: Courtroom 3, Oakland

1 I, Ryan Burningham, hereby declare as follows:

2 1. I am an attorney in the law firm of Susman Godfrey, LLP. I am counsel for Lead
3 Plaintiff Bradley Sostack. I am admitted *pro hac vice* to practice before this Court, and I have
4 personal knowledge of the matters set forth herein. If called as a witness, I could and would
5 testify competently thereto.

6 2. I make this declaration in support of Lead Plaintiff's Reply in Support of His
7 Motion to Compel Production of Documents and Privilege Log.

8 3. Attached to this declaration as **Exhibit 1** is a true and correct copy of a document
9 produced by Defendants on February 22, 2021, at 3:28 p.m. Pacific and numbered
10 RPLI_00302981.

11 4. Attached to this declaration as **Exhibit 2** is a true and correct copy of a document
12 produced by Defendants on February 22, 2021, at 3:28 p.m. Pacific and numbered
13 RPLI_00302989.

14 5. Attached to this declaration as **Exhibit 3** is a true and correct copy of a document
15 produced by Defendants on February 22, 2021, at 3:28 p.m. Pacific and numbered
16 RPLI_00303004.

17 6. Attached to this declaration as **Exhibit 4** is a true and correct copy of a document
18 produced by Defendants on February 22, 2021, at 3:28 p.m. Pacific and numbered
19 RPLI_00303011.

20 7. Attached to this declaration as **Exhibit 5** is a true and correct copy of a document
21 produced by Defendants on February 22, 2021, at 3:28 p.m. Pacific and numbered
22 RPLI_00303032.

23 8. [This paragraph intentionally left blank]

24 9. To date, Plaintiff has served 102 RFPs on Defendants.

25 10. To date, Defendants have served 88 RFPs on Plaintiff.
26
27
28

1 I declare under penalty of perjury that the foregoing is true and correct.

2
3 Signed this 1st day of March, 2021, at Seattle, WA.

4 By: /s/ P. Ryan Burningham

5 P. Ryan Burningham
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2021, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

/s/ P. Ryan Burningham

P. Ryan Burningham